

ITEM: 23

SUBJECT: Tuolumne Utilities District, Sonora Regional Wastewater Treatment Plant and Jamestown Wastewater Treatment Plant, Tuolumne County

BOARD ACTION: *Consideration of renewal of NPDES Permit*

BACKGROUND: The Tuolumne Utilities District (TUD) owns and operates the Sonora Regional Wastewater Treatment Plant (SRWTP), and associated wastewater collection and disposal system. The TUD provides sewer services to approximately 25,000 people and has design capacity of 2.6 million gallons per day (mgd). The SRWTP produces secondary treated, disinfected effluent that is discharged to a large storage reservoir (Quartz Reservoir) prior to distribution for reclamation by agricultural end-users. The Jamestown Sanitary District (JSD), owns and operates the JSD Wastewater Treatment Plant, which provides sewer service to about 3,000 people. JSD has no facilities for effluent disposal and has contracted for its effluent disposal with the TUD. The JSD Wastewater Treatment Plant discharges secondary treated, disinfected effluent to Quartz Reservoir, at an average dry weather flow rate of 0.28 mgd. At present, the secondary treated wastewater is used for irrigation of agricultural lands owned either by the TUD or private parties under contract for the use of the reclaimed wastewater during the dry months and part of the winter months as weather allows. During high precipitation years excess water that is stored in Quartz Reservoir is discharged seasonally to Woods Creek, when the effluent can receive at least a 20:1 dilution (creek: effluent) from Woods Creek.

Comments were received from the California Sportfishing Protection Alliance (CSPA), the Central Sierra Environmental Resource Center (CSERC), and the Central Valley Clean Water Association. A Response to Comments document is included in the agenda package that fully addresses the comments. Some minor changes have been made to the proposed Order in response to the comments.

ISSUES: CSPA and CSERC are contesting the proposed Permit. The major issues discussed in the public comments are summarized below:

Dilution Credits: CSPA contends that the proposed permit allows for dilution credits for human health criteria in violation of the requirements of the Basin Plan and the SIP.

The dilution credits allowed in the proposed permit are in full compliance with the SIP and the Basin Plan and follows USEPA TSD guidance. The proposed Order only allows a mixing zone for human health criteria. The establishment of a mixing zone and dilution credit for human health criteria in the proposed Order complies with the SIP and Basin Plan.

Effluent Limitation for Bis(2-ethylhexyl)phthalate: CSPA contends that the proposed permit fails to include an effluent limitation for bis(2-ethylhexyl)phthalate despite a reasonable potential to exceed water quality standards.

Bis (2-ethylhexyl) phthalate samples can be easily contaminated when plastic containers are used or by the use of rubber gloves. Due to uncertainty in the sample results provided by the Discharger, there is insufficient information to conduct reasonable potential analysis. The proposed Order requires a 1-year study to sample monthly for bis(2-ethylhexyl) phthalate in the effluent and receiving water using clean sampling techniques. Should monitoring results indicate that the discharge has a reasonable potential, the Order may be reopened to add an effluent limit for bis (2-ethylhexyl) phthalate.

Evaluation of Land Disposal Alternative: CSPA contends that the Basin Plan prohibits the discharge of wastewater to low flow streams as a permanent means of disposal and it requires the evaluation of land disposal alternatives.

The proposed Order only allows a discharge to Woods Creek when there is at minimum a 20:1 flow ratio (creek: effluent), and only during the wet season. Therefore, the Basin Plan requirement is not applicable in this case. With regard to the evaluation of the land disposal alternatives, the Discharger developed a Feasibility Report based on a thorough evaluation of all land disposal alternatives that demonstrated that there is insufficient storage capacity during high precipitation years. The Report further demonstrated that it is infeasible to add additional storage. Additionally, in an effort to maximize the land disposal and to eliminate the discharge to surface water, the proposed Order requires the Discharger to implement disposal alternatives that best meet the long-term solution for the wastewater storage and land disposal that would minimize the need for seasonal surface water discharge.

Water Conservation Program: CSERC requests that the proposed permit include a provision requiring the TUD to develop and implement a comprehensive water conservation program to reduce wastewater discharge to Woods Creek. The proposed Order has been modified to include a special provision to address the need for a water conservation program.

Additional Comments: In addition to the issues discussed above, CSPA had additional comments regarding effluent limitations for Aluminum, MBAS, Chloride and metals based on hardness, acute and chronic toxicity, mass limitations, and concerns with the Anti-backsliding requirements and Anti-degradation analysis. These comments together with the staff response are discussed in more detail in the Staff Response to Comments document included in the agenda package.

Mgmt. Review _____
Legal Review _____LTO_____

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